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August 3, 1998

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AUG - 3 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Stop Code 1800E1
Television Branch

Re: MM Docket No. 87-268

Dear Ms. Salas:

This letter is written with regard to the pending settlement among the applicants for Channel 51 at Jackson, Mississippi and, in particular, on behalf of Paxson Communications Corporation ("PCC") the proposed permittee of the new television station at Jackson, Mississippi. On May 7, 1998, Fant Broadcast Development, L.L.C. ("Fant") filed a corrected Petition For Reconsideration seeking reconsideration of a portion of the Commission's *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24 (released February 23, 1998) to the extent the Commission allocated DTV Channel 51 to existing television station WLBT(TV) in Jackson, Mississippi. On May 26, 1998, Civic License Holding Company, Inc. ("Civic"), the licensee of WLBT(TV) in Jackson, Mississippi opposed Fant's Petition For Reconsideration. In its Opposition, Civic noted that it would have no objection to the applicants for NTSC Channel 51 in Jackson, Mississippi amending their applications to specify operation on a channel other than Channel 51.

On June 19, 1998, PCC submitted an Engineering Amendment to the pending settlement request of the Channel 51 applicants in Jackson, Mississippi requesting that NTSC Channel 51 be changed to Channel 59 and that the FCC, in approving the settlement, grant a permit to PCC for a new television station to operate on Channel 59 in Jackson, Mississippi. A copy of that Amendment is attached.

No. of Copies rec'd
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Magalie Roman Salas

August 3, 1998

Page 2

PCC respectfully request that the Mass Media Bureau and Office of Engineering and Technology take into account the June 19, 1998 Amendment in approving the Jackson, Mississippi settlement and ruling on the Fant Petition For Reconsideration.

Very truly yours,



John R. Feore, Jr.

Counsel for Paxson Communications Corporation

JRF/ljs

Enclosure

cc w/:

Clay Pendarvis, Esq. (FCC)

David Bennett, Esq. (FCC)

Mr. Bruce A. Franca (FCC)

Andrew S. Kersting, Esq. (Counsel for Fant Broadcast Development, LLC)

Carl R. Ramey, Esq. (Counsel for Civic License Holding Company, Inc.)

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June 19, 1998

RECEIVED

JUN 19 1998

Federal Communications Commission
Office of Secretary

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Stop Code 1800E1
Television Branch

Re: Paxson Communications Corporation
Channel 51, Jackson, Mississippi
FCC File No. BPCT-961001UV

Dear Ms. Salas:

There is transmitted herewith, in triplicate, on behalf of Paxson Communications Corporation ("PCC"), an Engineering Amendment to the above-referenced application for a new television station on Channel 51 at Jackson, Mississippi. The Amendment requests a channel change to Channel 59. This Amendment is submitted in response to the FCC's allocation of DTV Channel 51 to Television Station WLBT(TV), Jackson, Mississippi. The proposed substitution of Channel 59 for NTSC Channel 51 will permit the FCC to approve the pending settlement while effectuating the FCC's pronouncements in its *Sixth Further Notice and Sixth Report and Order* that it would protect pending NTSC applications on file by September 20, 1996.

On January 30, 1998, the existing applicants for Channel 51 in Jackson, Mississippi filed a Joint Request for Approval of Universal Settlement and, on February 13, 1998, PCC and George S. Flinn, Jr. filed an Amendment proposing the substitution of PCC as the applicant for the Jackson construction permit. By this instant Amendment, PCC is requesting approval of the Jackson, Mississippi television universal settlement, with PCC as the proposed permittee for Channel 59 in Jackson, Mississippi.

Should there be any questions concerning the enclosed amendment, kindly communicate with the undersigned.

Very truly yours,


John R. Feore, Jr.

JRF/lis

Enclosure

cc w/: Clay Pendarvis, Esq. (FCC - By Hand)
David Bennett, Esq. (FCC - By Hand)



Paxson Communications Corporation

June 17, 1998

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Stop Code 1800E1
Television Branch

Re: Paxson Communications Corporation
Channel 51, Jackson, Mississippi
FCC File No. BPCT-961001UV

Dear Ms. Salas:

Paxson Communications Corporation ("PCC") hereby submits an Engineering Amendment to the above-referenced application for a new television station on Channel 51 at Jackson, Mississippi. The Amendment requests a channel change to Channel 59. This Amendment is submitted in response to the FCC's allocation of DTV Channel 51 to Television Station WLBT(TV), Jackson, Mississippi. The proposed substitution of Channel 59 for NTSC Channel 51 will permit the FCC to approve the pending settlement while effectuating the FCC's pronouncements in its *Sixth Further Notice and Sixth Report and Order* that it would protect pending NTSC applications on file by September 20, 1996.

On January 30, 1998, the existing applicants for Channel 51 in Jackson, Mississippi filed a Joint Request for Approval of Universal Settlement and, on February 13, 1998, PCC and George S. Flinn, Jr. filed an Amendment proposing the substitution of PCC as the applicant for the Jackson construction permit. By this instant Amendment, PCC requests approval of the Jackson, Mississippi television universal settlement, with PCC as the proposed permittee for Channel 59 in Jackson, Mississippi.

Respectfully submitted,
PAXSON COMMUNICATIONS CORPORATION

William L. Watson, Vice President & Asst. Secretary

Paxson Communications Corporation
601 Clearwater Park Road • West Palm Beach, FL 33401
(561) 659-4122 • Fax (561) 659-4252
An American Stock Exchange Company Symbol PAX
Website pax.net

SECTION V-C - TV BROADCAST ENGINEERING DATA

FOR COMMISSION USE ONLY

File No. _____

SSB Referral Date _____

Referred By _____

Name of Applicant

Call Letters (if issued)

Paxson Communications Corporation

New

Purpose of Application: (check appropriate boxes)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Construct a new (main) facility | <input type="checkbox"/> Construct a new auxiliary facility |
| <input type="checkbox"/> Modify existing construction permit for main facility | <input type="checkbox"/> Modify existing construction permit for auxiliary facility |
| <input type="checkbox"/> Modify licensed main facility | <input type="checkbox"/> Modify licensed auxiliary facility |

If purpose is to modify, indicate the nature of change(s) by checking appropriate box(es) and specify the file number(s) of the authorizations affected.

- | | |
|---|---|
| <input type="checkbox"/> Antenna supporting structure height | <input type="checkbox"/> Effective radiated power |
| <input type="checkbox"/> Antenna height above average terrain | <input type="checkbox"/> Frequency |
| <input type="checkbox"/> Antenna location | <input type="checkbox"/> Antenna system |
| <input type="checkbox"/> Main Studio location | <input type="checkbox"/> Other (summarize) |

File Number(s) Amend. BPCT-961001UV

1. Allocation:

Channel No.	Offset (check one)	Principal community to be served:	Zone (check one)						
	<input type="checkbox"/> Plus	<table border="1"> <tr> <th>County</th> <th>City or Town</th> <th>State</th> </tr> <tr> <td>Hinds</td> <td>Jackson</td> <td>MS</td> </tr> </table>	County	City or Town	State	Hinds	Jackson	MS	<input type="checkbox"/> I
County	City or Town	State							
Hinds	Jackson	MS							
	<input type="checkbox"/> Minus		<input checked="" type="checkbox"/> II						
<u>59</u>	<input checked="" type="checkbox"/> Zero		<input type="checkbox"/> III						

2. Exact location of antenna.

- (a) Specify address, city, county and state. If no address, specify distance and bearing relative to the nearest town or landmark.
Approx. 0.98 NE of int. of Palestine & Seven Springs Roads, Hinds County, MS.
- (b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude and East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed. (The Commission requires coordinates based on NAD 27.)

Latitude	32°	14'	26"	Longitude	90°	24'	15"
----------	-----	-----	-----	-----------	-----	-----	-----

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? ☒ Yes ☐ No

If Yes, give call letter(s) or file number(s) or both. WMPN-FM, WJDX (FM), WJTV (TV), WDBD (TV) -cp

If proposal involves a change in height of an existing structure, specify existing height above ground level including antenna, all other appurtenances, and lighting, if any. N/A

Section V-B - TV BROADCAST ENGINEERING DATA (Page 2)

4. Does the application propose to correct previous site coordinates?

☐ Yes ☒ No

If Yes, list old coordinates.

Latitude	°	N/A	"	Longitude	°	N/A	"
----------	---	-----	---	-----------	---	-----	---

5. Has the FAA been notified of the proposed construction?

☐ Yes ☒ No

If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available.

Exhibit No. N/A

Date _____ Office where filed No change

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

	Landing Area	Distance (km)	Bearing (degrees True)
(a)	<u>John Bell Williams Air.</u>	<u>6.9</u>	<u>357 deg. T</u>
(b)	_____	_____	_____

7. (a) Elevation (to the nearest meter)

(1)	of site above mean sea level;	<u>102</u> meters
(2)	of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and	<u>491</u> meters
(3)	of the top of supporting structure above mean sea level [(a)(1) + (a)(2)].	<u>593</u> meters

(b) Height of antenna radiation center: (to the nearest meter)

(1)	above ground;	<u>358</u> meters
(2)	above mean sea level [(a)(1) + (b)(1)]; and	<u>460</u> meters
(3)	above average terrain.	<u>371</u> meters

8. Attach as an Exhibit sketch(es) of the supporting structure, labeling all elevations required in Question 7 above, except item 7(b)(3). If mounted on an AM directional array element, specify heights and orientations of all array towers, as well as location of FM radiator.

Exhibit No. Figure 2

9. Maximum visual effective radiated power: 3,180 kw

Section V-C - TV BROADCAST ENGINEERING DATA (Page 3)

10. Antenna

(a) Manufacturer Dielectric (b) Model No. TFU-31JSC C170

(c) Is a directional antenna proposed?

☒ Yes ☐ No

If Yes, specify major lobe azimuth(s) 100 & 320 degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.

Exhibit No.
Figure 5

(d) Is electrical beam tilt proposed?

☒ Yes ☐ No

If Yes, specify 0.75 degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.

Exhibit No.
Figure 5

(e) Is mechanical beam tilt proposed?

☐ Yes ☒ No

If Yes, specify _____ degrees mechanical beam tilt toward azimuth _____ degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.

Exhibit No.
N/A

(f) The proposed antenna is: (check only one box)

☒ Horizontally polarized ☐ Circularly polarized ☐ Elliptically polarized

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.685(a) and (b)?

☒ Yes ☐ No

If No, attach as an Exhibit justification therefor, including amounts and percentages of population and area that will not receive City Grade service.

Exhibit No.
N/A

12. Will the main studio be located within the station's predicted principal community contour as defined by 47 C.F.R. Section 73.685(a)?

☒ Yes ☐ No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125.

Exhibit No.
N/A

13. Does the proposed facility satisfy the requirement of 47 C.F.R. Section 73.610?

☒ Yes ☐ No

If No, attach as an Exhibit justification therefor, including a summary of any previously granted waivers.

Exhibit No.
N/A

14. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters; or (b) in the general vicinity, any nonbroadcast (except citizens band or amateur) radio stations or any established commercial or government receiving stations?

☒ Yes ☐ No

If Yes, attach as an Exhibit a description of any expected, undesired effects of operations and remedial steps to be pursued if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (including that caused by intermodulation) to facilities in existence or authorized prior to grant of this application. (See 47 C.F.R. Sections 73.685(d) and (g).)

Exhibit No.
Tech.

15. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.684(g). The map must further display clearly and legibly the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.
Figure 1

Section V-C - TV BROADCAST ENGINEERING DATA (Page 4)

16. Attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
Figure 3

- (a) the proposed transmitter location, and the radials along which profile graphs have been prepared;
- (b) the City Grade, Grade A and Grade B contours; and
- (c) the legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population (latest census) within the predicted Grade B contour.

Area 19,136 sq. km.
(US Land Area)

Population 559,329
(1990 Census)

18. For an application involving an auxiliary facility only, attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
N/A

- (a) the proposed auxiliary Grade B contour; and
- (b) the Grade B contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license.

(Main facility license file number: N/A)

19. Terrain and coverage data (to be calculated in accordance with 47 C.F.R. Section 73.684)

Source of terrain data: (check only one box below)

☒ Linearly interpolated 30-second database (Source: N.G.D.C.)

☐ 7.5 minute topographic map

☐ Other (briefly summarize)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances		
		To the City Grade Contour (kilometers)	To the Grade A contour (kilometers)	To the Grade B contour (kilometers)
*				
0	383.1	55.8	65.4	85.0
45	366.0	54.8	64.2	83.3
90	359.8	55.7	65.1	84.5
135	348.9	52.2	61.5	79.4
180	360.1	35.7	44.7	60.1
225	379.0	36.4	45.6	61.3
270	397.4	50.4	60.0	78.0
315	375.9	56.6	66.2	86.1

*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of HAAT.

Section V-C - TV BROADCAST ENGINEERING DATA (Page 5)

20. Environmental Statement. (See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding identified health and safety guidelines issued by the American National Standards Institute?

☐ Yes ☒ No

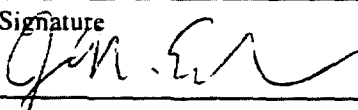
Exhibit No.
N/A

If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

If no, explain briefly why not. Categorically excluded. See Technical Narrative.

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed)	Relationship to Applicant (e.g., Consulting Engineer)
Jonathan N. Edwards	Technical Consultant
Signature 	Address (include ZIP Code) 240 N. Washington Blvd., Suite 700 Sarasota, Florida 34236-5929
Date June 15, 1998	Telephone No. (include Area Code) (941) 366-2611

TECHNICAL EXHIBIT
AMENDMENT TO THE APPLICATION
FOR TV CONSTRUCTION PERMIT
NEW TV STATION
JACKSON, MISSISSIPPI

June 15, 1998

CH 59 3180 KW (MAX-DA) 371 m

TECHNICAL EXHIBIT
AMENDMENT TO THE APPLICATION
FOR TV CONSTRUCTION PERMIT
NEW TV STATION
JACKSON, MISSISSIPPI
CH 59 3180 KW (MAX-DA) 371 M

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TECHNICAL EXHIBIT
AMENDMENT TO THE APPLICATION
FOR TV CONSTRUCTION PERMIT
NEW TV STATION
JACKSON, MISSISSIPPI

CH 59 3180 KW (MAX-DA) 371 M

Technical Narrative

This technical exhibit supports an amendment to the application (BPCT-961001UV) for construction permit for operation on channel 59 (740-746 MHz) at Jackson, Mississippi. This application has been prepared on behalf of Paxson Communications Corporation (herein "Paxson"). The current application proposes operation on channel 51 with a non-directional antenna visual effective radiated power (ERP) of 724 kilowatts (kW) and a height above average terrain (HAAT) of 377 meters. Paxson proposes to change channel, change the transmitter site, incorporate a directional antenna (DA) system, increase ERP and slightly reduce the antenna HAAT. A DA maximum visual effective radiated power (ERP) of 3180 kilowatts (kW) and antenna HAAT of 371 meters are proposed.

Channel 51 is a commercial analog TV allotment to Jackson, Mississippi. Although applications have been pending for use of the allotment since July 1996, the FCC used the channel for DTV allotment for a Jackson TV station. The current NTSC channel 51 allotment is being displaced by the DTV allotment for station WLBT-TV on channel 51 at Jackson (see Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order in MM Docket

No. 87-268 (98-24) ("Memorandum/Sixth Report") at Appendix B}. So that the FCC's DTV allotment table can be accommodated, it is proposed to change the Jackson channel 51 analog operation to channel 59.

It is proposed to side-mount the directional antenna on the WJTV (Ch.12, Jackson) existing tower. The tower has an overall height above ground of 491.0 meters (1611 feet). Since there will be no change in overall height, the Federal Aviation Administration (FAA) is not being notified of the proposed construction. The existing structure is registered with the FCC (No. 1042633). It is believed that this instant application complies with all applicable rules and regulations of the FCC.

Proposed Transmitter Location

The WJTV transmitter site is located approximately 0.98 km at a bearing of 45° True from the intersection of Palestine and Seven Springs Roads, in Baldwin County, Mississippi. The site is approximately 22 kilometers west-southwest of the Jackson city reference point. The tower location is uniquely described by the following geographic coordinates (NAD 27):

32° 14' 26" North Latitude

90° 24' 15" West Longitude

A map showing the proposed transmitter location is included herein as Figure 1. A sketch of the proposed antenna and supporting structure is included as Figure 2.

The proposed directional antenna consists of a Dielectric TFU-31JSC C170. The antenna's azimuthal pattern

is shown on Sheet 1 of Figure 5. The antenna will incorporate an electrical beam tilt of 0.75° (see Sheet 3 of Figure 5). The antenna's major lobes are oriented toward 100° and 320° T.

Response to Paragraph 14

There are no AM stations within 5 kilometers (3.1 miles) of the proposed site. The following tabulates the known authorized full service FM and TV facilities within 16 kilometers (10 miles) of the proposed site.

<u>Station</u>	<u>Channel</u>	<u>Bearing($^{\circ}$True)</u>	<u>Distance(km)</u>
WMPN-FM, Jackson, MS	217C	0	0.0
WJDX, Jackson, MS	242C	0	0.0
WKTF(CP), Jackson, MS	238C	194	3.7
WJKK, Vicksburg, MS	254C1	194	3.7
WSTZ-FM, Vicksburg, MS	294C	194	3.7
WMSI, Jackson, MI	275C	146	3.8
WKTF, Jackson, MI	238C	68	11.1
WJMI, Jackson, MI	259C	68	11.1
WTYX, Jackson, MI	234C	66	11.3
WHJT, Clinton, MS	228A	33	12.9
WJTV, Jackson, MS	12	0	0.0
WDBD(CP), Jackson, MS	40	0	0.0
WLBT-TV, Jackson, MS	3	146	3.7
WMPN-TV, Jackson, MS	*29	146	3.7
WAPT, Jackson, MS	16	68	11.1

Although no prohibitive electromagnetic interference is expected, the applicant recognizes its responsibility to correct problems, which may arise due to its proposed operation.

Coverage Contours

The distances to predicted coverage contours were determined in accordance with the provisions of Section

73.684 and Figure 10b of Section 73.699 except that, pursuant to current FCC practice, no consideration was given to terrain roughness correction factors. The average elevations from 3.2 to 16.1 kilometers from the transmitter site, were obtained from the NGDC 30-second terrain database and were used for determining the distances to coverage contours. Thirty-six radials evenly spaced at 10-degree intervals were employed. Figure 3 is a map showing the predicted coverage contours. The map provides the City Grade (80 dBu), Grade A (74 dBu) and Grade B (64 dBu) contours. The limits of Jackson are identified and are based on information contained in the 1990 Census for Mississippi. The predicted City Grade contour encompasses the Jackson city limits. The population to be served within the predicted Grade B contour was determined by a computer program which totals the population within census enumeration districts located within the Grade B contour. The 1990 Census was employed. The land area within the Grade B contour was determined by computer algorithm.

Allocation Study

Because of the FCC's requirement to vacate the Jackson channel 51 allotment, a search of the remaining TV band (channels 2 through 59) was conducted. Channel 59 is believed to present the best possibility for the FCC to retain the proposed commercial analog TV service to the Jackson area. Therefore it is requested that the FCC substitute analog channel 59 for the analog channel 51 that is being displaced by the DTV allotment for station WLBT-TV.

Figure 4 is a copy of the television allocation study showing pertinent analog and digital stations and allotments. The proposed site meets all of the NTSC and DTV separations for channel 59, based on the FCC's Rules. No other calculated interference will be caused to any DTV allotments on channels 58, 59 or 60.


The proposed site is more than 1200 kilometers from the closest point of the Canadian Border. The proposed site is more than 900 kilometers from the closest point of the Mexican border. The closest FCC monitoring station is at Powder Springs, Georgia located 559 kilometers to the northeast. The National Radio Quiet Zone (VA/WV) is located 1075 kilometers to the northeast. The Table Mountain Radio Quiet Zone (CO) is located 1589 kilometers to the northwest. The closest radio astronomy site conducting research on TV channel 37 is at North Liberty, Iowa, located than 1065 kilometers to the north. All these separations are sufficient to avoid interference from the proposed channel 59 operation.

Environmental Consideration

Consideration has been given to the FCC's RF emission rules whose implementation date was October 15, 1997. Sheets 3 and 4 Figure 5 provide vertical plane relative field information for the proposed Dielectric TFU-31JSC C170 antenna system. The power density calculations are based on a relative field factor of 0.1, a visual ERP of 3180 kW and 22% aural power. The proposed power density at 2 meters above ground at the tower base will be 0.0052 mW/cm^2 , which is less than 5% of the recommended limit of 0.50 mW/cm^2 for channel 59, applicable to general population/uncontrolled exposure areas.

Therefore, the proposal will comply with the FCC's RF emission rules.

Access to the transmitting site will be restricted and appropriately marked with warning signs. Furthermore, as this is a multi-user site an agreement will be in effect in the event that workers or other authorized personnel enter the restricted area appropriate measures shall be taken to limit RF energy exposure. Such measures include limiting the exposure time, wearing protective clothing, reducing power to an acceptable level or termination of transmitter output power all together until workers leave the restricted area.



Jonathan N. Edwards

du Treil, Lundin & Rackley, Inc.
240 North Washington Blvd.
Suite 700
Sarasota, Florida 34236

June 15, 1998

Figure 1

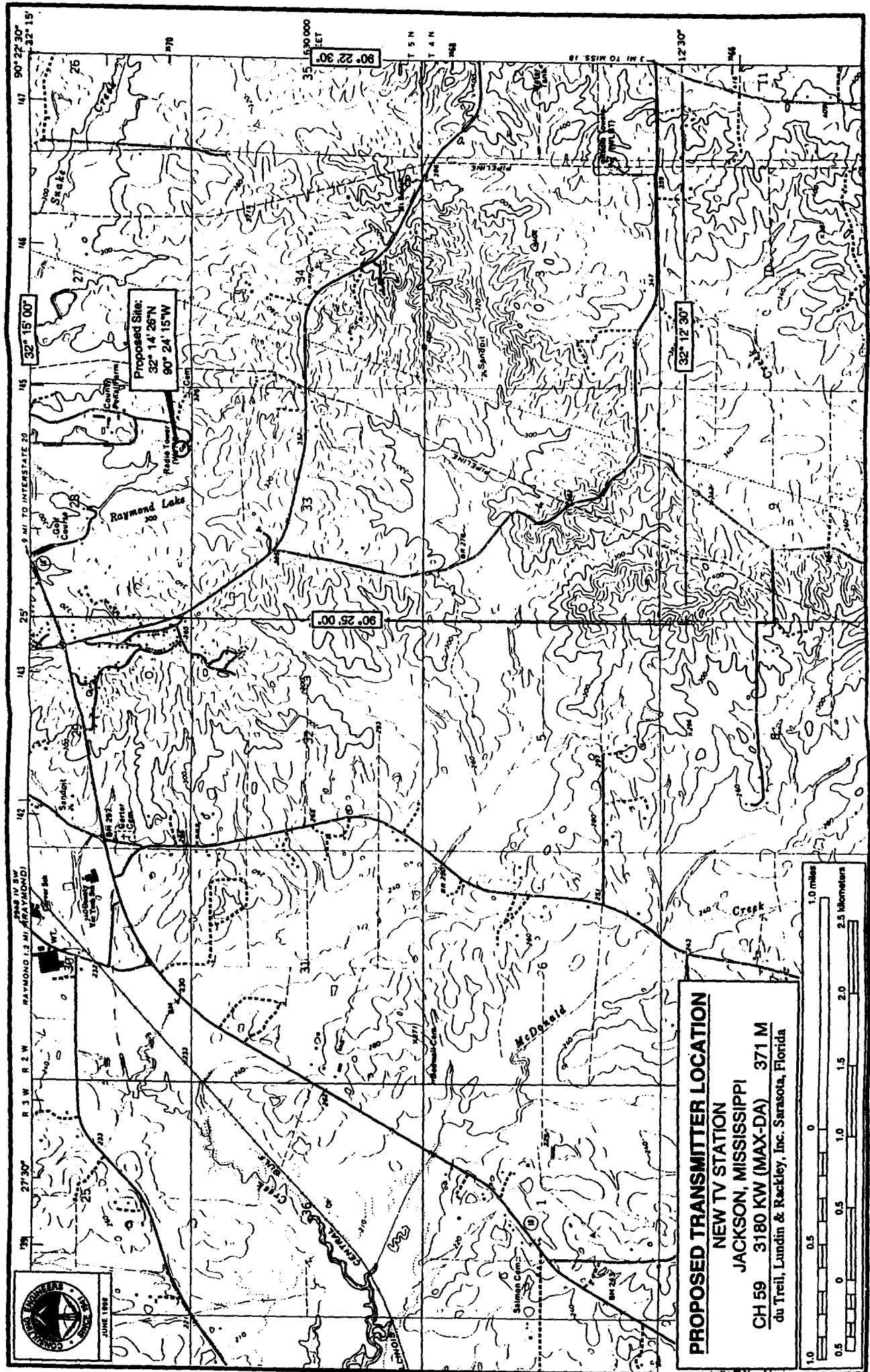
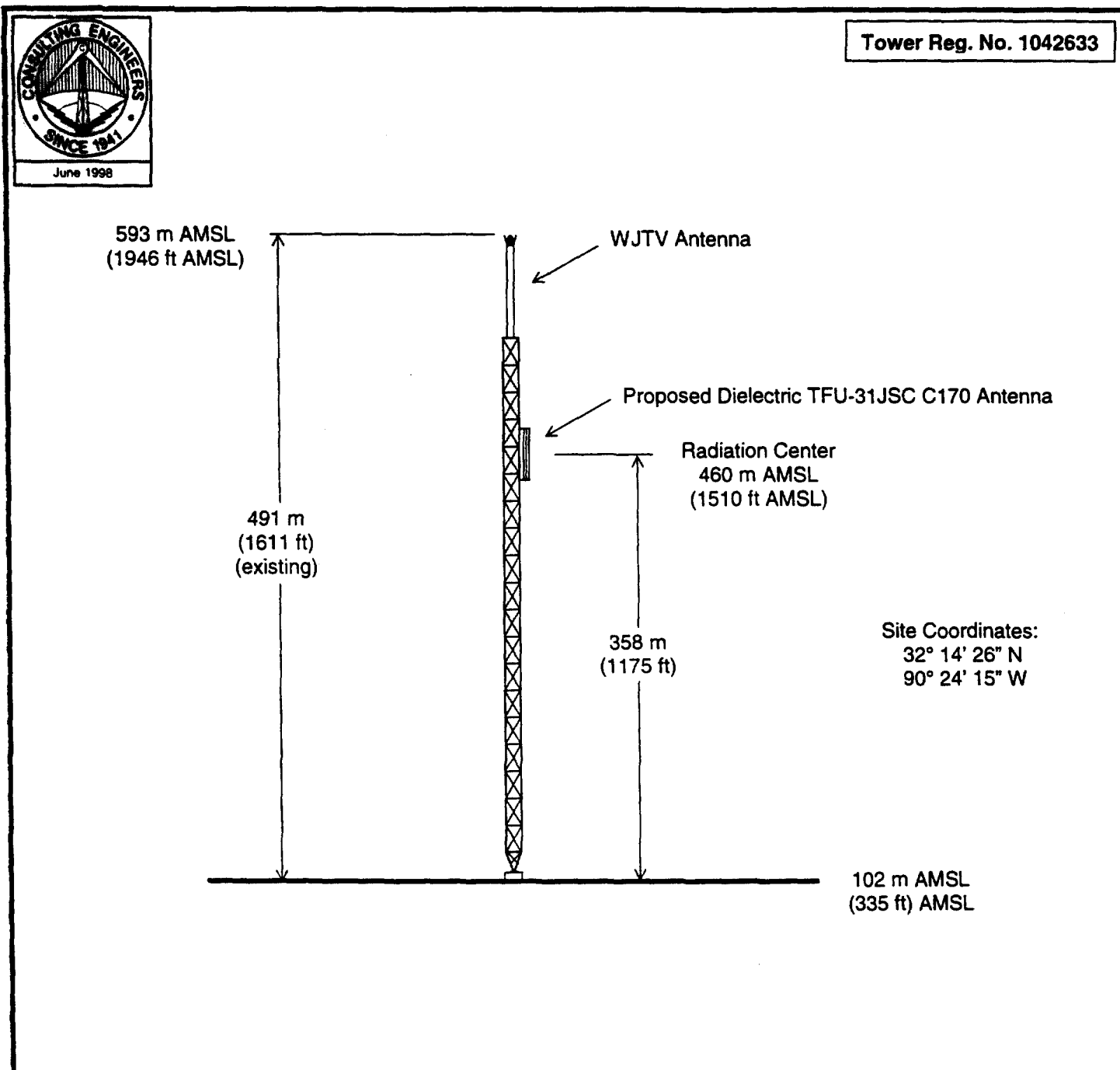


Figure 2



PROPOSED ANTENNA AND SUPPORTING STRUCTURE

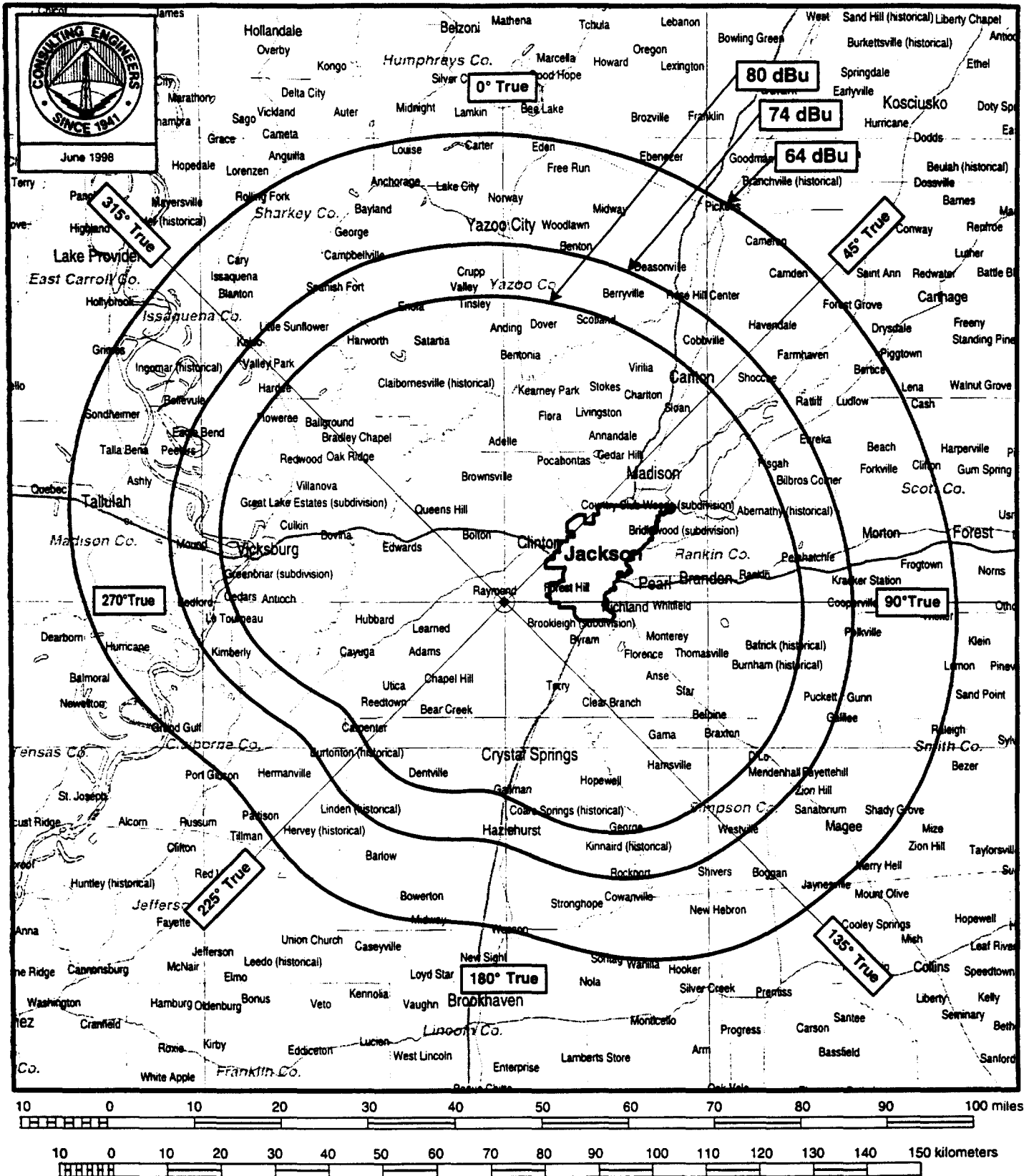
NEW TV STATION

JACKSON, MISSISSIPPI

CH 59 3180 KW (MAX-DA) 371 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3



PREDICTED COVERAGE CONTOURS

NEW TV STATION
JACKSON, MISSISSIPPI

CH 59 3180 KW (MAX-DA) 371 M

du Treil, Lundin & Rackley, Inc Sarasota, Florida

TV -> TV Separation Study

Job Title :Jackson, MS
 Zone : 2
 Channel 59 (740-746 MHz)

Separation Buffer 161 km
 FCC TV DB Date : 06/12/98
 Coordinates : 32-14-26 90-24-15

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WDTLTV	GREENVILLE		44(o)	1000	33-32-35	344.2	150.27	119.9
CP	MS	BPCT-960126KH	II	145	90-50-48		30.37	CLEAR
WGMB	BATON ROUGE		44(+)	3890 DA	30-19-35	201.5	227.92	119.9
LIC	LA	BLCT-910813KF	III	426	91-16-36		108.02	CLEAR
NEW	COLUMBIA		*45(o)	589.	31-16-00	153.3	120.83	95.7
APP	MS	BPET-960724KR	III	113	89-49-56		25.13	CLEAR
REQUESTS A WAIVER OF FREEZE.								
ALLOC.	COLUMBIA		*45(o)		31-15-15	153.7	121.93	95.7
MS	-		III	0	89-50-08		26.23	CLEAR
NEW	HOUSTON		45(+)	5000	33-47-40	35.0	211.73	95.7
APP	MS	BPCT-960827KE	II	506	89-05-16		116.03	CLEAR
NEW	HOUSTON		45(+)	5000	33-47-40	35.0	211.73	95.7
APP	MS	BPCT-961001LQ	II	492	89-05-16		116.03	CLEAR
NEW	HOUSTON		45(+)	5000 DA	33-50-37	37.0	224.14	95.7
APP	MS	BPCT-961001LH	II	215	88-56-35		128.44	CLEAR
ALLOC.	HOUSTON		45(+)		33-53-48	35.0	225.59	95.7
MS	-		II	0	89-00-06		129.89	CLEAR
NEW	HOUSTON		45(+)	4370 DA	33-54-00	37.9	234.87	95.7
APP	MS	BPCT-960404KS	II	217	88-50-30		139.17	CLEAR
NEW	HOUSTON		45(+)	5000	33-54-46	37.7	236.31	95.7
APP	MS	BPCT-961001KY	II	205	88-50-09		140.61	CLEAR
ALLOC.	JACKSON		51(o)		32-17-54	72.1	21.03	
MS	-		II	0	90-11-30			
ADD	EL DORADO		*52(o)		32-46-49	288.2	197.64	95.7
AR	-		II	0	92-24-31		101.94	CLEAR
RM TO SUBSTITUTE CH *52 FOR CH *30+ - APPLICATION SITE.								
ADD	EL DORADO		*52(o)		33-12-24	301.3	209.94	95.7
AR	-		II	0	92-19-48		114.24	CLEAR
RM TO SUBSTITUTE CH *52 FOR CH *30+ - ALLOTMENT SITE.								
NEW	WIGGINS		56(+)	5000	31-07-09	149.9	143.59	31.4
APP	MS	BPCT-960920LV	III	609	89-38-49		112.19	CLEAR
REQUESTS A WAIVER OF FREEZE.								

TV -> TV Separation Study

Job Title : Jackson, MS
Zone : 2
Channel 59 (740-746 MHz)

Separation Buffer 161 km
FCC TV DB Date : 06/12/98
Coordinates : 32-14-26 90-24-15

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
	WIGGINS		56(+)		30-52-54	145.3	182.90	31.4
ALLOC.	MS	-	III	0	89-18-44		151.50	CLEAR
SITE RESTRICTION OF 10.6 MILES WEST.								
	HAMMOND		62(+)		30-30-06	181.6	192.88	31.4
ALLOC.	LA	-	III	0	90-27-42		161.48	CLEAR

** End of TV Separation Study for Channel 59 **

TV ->DTV Separation Study

Job Title :Jackson, MS
Zone : 2
Channel 59 (740-746 MHz)

Separation Buffer 161 km
FCC DTV DB Date: 03/16/98
Coordinates : 32-14-26 90-24-15

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
DWMAWTV DTVALT	MERIDIAN MS		44 III	50.00 369.	32-08-18 89-05-36	94.9	124.13 27.53	24.1/96.6 CLEAR
DWGMB DTVALT	BATON ROUGE LA		45 III	143.30 426.	30-19-35 91-16-36	201.5	227.91 131.31	24.1/96.6 CLEAR
DWLBTTV DTVALT	JACKSON MS		51 II	1000.0 610.	32-12-46 90-22-54	145.6	3.74 20.36	24.1/96.6 CLEAR
DWJTV DTVALT	JACKSON MS		52 II	1000.0 497.	32-14-26 90-24-15	0.0	0.00 24.10	24.1/96.6 CLEAR
DKNOETV DTVALT	MONROE LA		55 II	1000.0 576.	32-11-45 92-04-10	268.6	157.06 60.46	24.1/96.6 CLEAR
DKAQY DTVALT	COLUMBIA LA		57 II	1000.0 572.	32-03-19 92-11-12	263.5	169.42 72.82	24.1/96.6 CLEAR
DWTVA DTVALT	TUPELO MS		57 II	1000.0 542.	33-47-40 89-05-16	35.0	211.72 115.12	24.1/96.6 CLEAR
DWHLT DTVALT	HATTIESBURG MS		58 III	52.00 244.	31-24-20 89-14-13	129.8	144.17 38.17	12.0/106.0 CLEAR
DWDIQ DTVALT	DOZIER AL		59 III	1000.0 210.	31-33-16 86-23-32	100.3	387.08 142.48	244.6 CLEAR

** End of DTV Separation Study for Channel 59 **

Date	11 Jun 1998	
Call Letters	NEW	Channel 59
Location	Jackson, MS	
Customer	Paxson	
Antenna Type	TFU-31JSC C170	

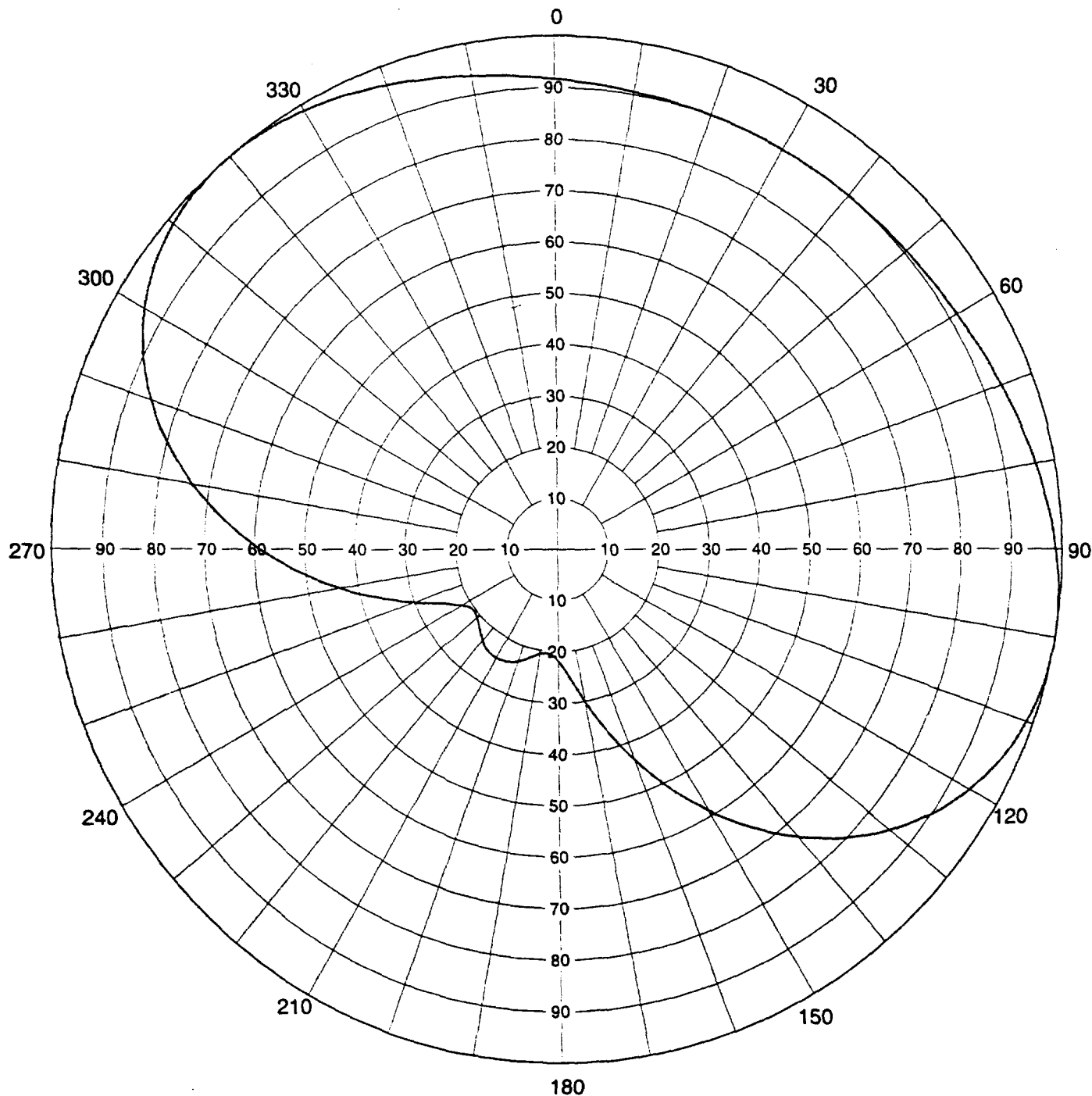
AZIMUTH PATTERN

RMS Gain at Main Lobe
Calculated / Measured

1.70 (2.30 dB)
Calculated

Frequency
Drawing #

743 MHz
C170



Date 11 Jun 1998
Call Letters NEW Channel 59
Location Jackson, MS
Customer Paxson
Antenna Type TFU-31JSC C170

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # C170

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
0	0.917	45	0.902	90	0.988	135	0.797	180	0.218	225	0.219	270	0.588	315	0.997
1	0.915	46	0.903	91	0.990	136	0.785	181	0.214	226	0.216	271	0.604	316	0.998
2	0.914	47	0.903	92	0.992	137	0.773	182	0.210	227	0.214	272	0.619	317	0.999
3	0.912	48	0.904	93	0.993	138	0.760	183	0.207	228	0.211	273	0.634	318	1.000
4	0.911	49	0.905	94	0.995	139	0.747	184	0.206	229	0.209	274	0.648	319	1.000
5	0.910	50	0.905	95	0.996	140	0.733	185	0.204	230	0.207	275	0.663	320	1.000
6	0.909	51	0.906	96	0.997	141	0.720	186	0.204	231	0.206	276	0.677	321	1.000
7	0.908	52	0.907	97	0.998	142	0.706	187	0.204	232	0.205	277	0.692	322	0.999
8	0.907	53	0.908	98	0.999	143	0.692	188	0.205	233	0.204	278	0.706	323	0.998
9	0.906	54	0.909	99	1.000	144	0.677	189	0.206	234	0.204	279	0.720	324	0.997
10	0.905	55	0.910	100	1.000	145	0.663	190	0.207	235	0.204	280	0.733	325	0.996
11	0.905	56	0.911	101	1.000	146	0.648	191	0.209	236	0.206	281	0.747	326	0.995
12	0.904	57	0.912	102	1.000	147	0.634	192	0.211	237	0.207	282	0.760	327	0.993
13	0.903	58	0.914	103	0.999	148	0.619	193	0.214	238	0.210	283	0.773	328	0.992
14	0.903	59	0.915	104	0.998	149	0.604	194	0.216	239	0.214	284	0.785	329	0.990
15	0.902	60	0.917	105	0.997	150	0.588	195	0.219	240	0.218	285	0.797	330	0.988
16	0.902	61	0.918	106	0.996	151	0.573	196	0.222	241	0.223	286	0.809	331	0.986
17	0.901	62	0.920	107	0.994	152	0.558	197	0.224	242	0.229	287	0.821	332	0.983
18	0.901	63	0.922	108	0.992	153	0.543	198	0.227	243	0.235	288	0.832	333	0.981
19	0.901	64	0.924	109	0.990	154	0.527	199	0.229	244	0.243	289	0.843	334	0.978
20	0.900	65	0.926	110	0.987	155	0.512	200	0.232	245	0.251	290	0.854	335	0.976
21	0.900	66	0.928	111	0.984	156	0.497	201	0.234	246	0.260	291	0.864	336	0.973
22	0.900	67	0.930	112	0.981	157	0.482	202	0.236	247	0.269	292	0.874	337	0.971
23	0.900	68	0.932	113	0.977	158	0.466	203	0.238	248	0.280	293	0.883	338	0.968
24	0.900	69	0.934	114	0.973	159	0.451	204	0.240	249	0.290	294	0.893	339	0.965
25	0.900	70	0.936	115	0.968	160	0.437	205	0.241	250	0.302	295	0.901	340	0.963
26	0.899	71	0.939	116	0.963	161	0.422	206	0.242	251	0.313	296	0.910	341	0.960
27	0.899	72	0.941	117	0.958	162	0.407	207	0.243	252	0.326	297	0.918	342	0.957
28	0.899	73	0.944	118	0.952	163	0.393	208	0.244	253	0.338	298	0.925	343	0.954
29	0.899	74	0.946	119	0.946	164	0.379	209	0.244	254	0.352	299	0.933	344	0.952
30	0.899	75	0.949	120	0.940	165	0.365	210	0.245	255	0.365	300	0.940	345	0.949
31	0.899	76	0.952	121	0.933	166	0.352	211	0.244	256	0.379	301	0.946	346	0.946
32	0.899	77	0.954	122	0.925	167	0.338	212	0.244	257	0.393	302	0.952	347	0.944
33	0.899	78	0.957	123	0.918	168	0.326	213	0.243	258	0.407	303	0.958	348	0.941
34	0.899	79	0.960	124	0.910	169	0.313	214	0.242	259	0.422	304	0.963	349	0.939
35	0.900	80	0.963	125	0.901	170	0.302	215	0.241	260	0.437	305	0.968	350	0.936
36	0.900	81	0.965	126	0.893	171	0.290	216	0.240	261	0.451	306	0.973	351	0.934
37	0.900	82	0.968	127	0.883	172	0.280	217	0.238	262	0.466	307	0.977	352	0.932
38	0.900	83	0.971	128	0.874	173	0.269	218	0.236	263	0.482	308	0.981	353	0.930
39	0.900	84	0.973	129	0.864	174	0.260	219	0.234	264	0.497	309	0.984	354	0.928
40	0.900	85	0.976	130	0.854	175	0.251	220	0.232	265	0.512	310	0.987	355	0.926
41	0.901	86	0.978	131	0.843	176	0.243	221	0.229	266	0.527	311	0.990	356	0.924
42	0.901	87	0.981	132	0.832	177	0.235	222	0.227	267	0.543	312	0.992	357	0.922
43	0.901	88	0.983	133	0.821	178	0.229	223	0.224	268	0.558	313	0.994	358	0.920
44	0.902	89	0.986	134	0.809	179	0.223	224	0.222	269	0.573	314	0.996	359	0.918